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Qwest
Spirit of Service

November 15, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: **WC Docket No. 02-314 – Application of Qwest Communications International Inc. for Authorization to Provide In-Region, InterLATA Service in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming**

Dear Ms. Dortch:

On October 31, 2002, Qwest Communications International Inc. ("Qwest") provided in the above-referenced proceeding statewide average performance summaries for Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming for September 2002. On November 5, 2002, Qwest submitted an *ex parte* filing in response to questions by the FCC staff regarding the summaries. In that filing, Qwest indicated that it would upon request submit revised statewide summaries reflecting the corrections described in the November 5, 2002, filing.

The FCC staff has raised additional questions regarding the summaries (reflected in part by the attached spreadsheet), and has requested a revised version of the summaries, which is attached. As further clarification, Qwest submits that most of the problems noted in the previously provided spreadsheet can be resolved by explanations that show they are not really problems. The remaining few are corrected in the attached revision of the spreadsheet of nine-state results.

Corrections in the Attached Revision

- MR-10, Customer and Non-Qwest Related Troubles, for UNE-P, Centrex 21: These have been corrected to show "N/A" in the "Met Std" columns, since the standard for these results is "diagnostic."

- MR-7, Repair Repeat Report Rate, Line Sharing, Colorado, Non-Dispatched (ND) and Dispatched (D): For Colorado, Line Sharing has a MR-7 standard of parity with Qwest DSL, which is the source of the standard deviation and modified Z-score information

shown. However, three entries in the "Met Std" column were still not correct. These have been corrected (Jun 02 "ND" from "Yes" to "No;" Jul 02 "D" from "N/A" to "No;" and Sep 02 "D" from "N/A" to "Yes").

- PO-19A and -19B, Stand-Alone Test Environment Accuracy (SATE), July 2002: These have been corrected to show "Yes" in the "Met Std" column. (We note that PO-19B is not yet in the PID, but was agreed to in negotiations in Arizona. Nevertheless, we are reporting the data, and it is meeting the standard, so we are applying this correction to PO-19B also.)

- OP-3, Commitments Met, for EELs: These have been updated to show the correct "Met Std" indication, based on the 90% benchmark established in the PID.

- GA-1D, Gateway Availability – IMA-GUI, SIA, June 2002: These have been corrected to show, "Yes," in the "Met Std" column. (We note that GA-1D is not yet in the PID. Nevertheless, we are reporting results for this measurement, because it represents a system that is being transitioned to replace the "Fetch-n-Stuff" and "Data Arbiter" systems that are measured by GA-1B and GA-1C, respectively, which are in the PID.)

Explanations for Remaining Items

The remainder of the items are explained by a few principles that must be applied in evaluating results. (All but two are covered by the first explanation below, which was apparently recognized as a possible explanation in the FCC's spreadsheet where the note appeared, "Maybe ok since Qwest volume = 1." This serves to confirm that observation as the reason for the items noted.)

- Cases in which Volume = 0 or 1; or Results = 0, 0%, or 100%: These conditions indicate that there is not enough evidence to reject the hypothesis of parity. Therefore, the "Met Std" column should indicate, "N/A," as the spreadsheet continues to do. From a statistical standpoint, a standard deviation and modified Z-score cannot be calculated where there is no "deviation" or "variance" in the data, which these conditions represent.[1] Hence, the data cannot produce a conclusion that the parity hypothesis should be rejected. This explanation covers the following measurements noted in the spreadsheet, although it applies in all cases with the aforementioned conditions:

[1] There is another possible situation, where volume is greater than 1 or 2, that can result in there being no modified Z-score. That situation is where all the individual data points that make up the volume are equal, which again yields no deviation or variance and, thus, no modified Z-score. Naturally, the lower the volume, the more likely it might be for such a situation to exist. (In an environment of standard intervals, such situations are not as unlikely as they might otherwise seem.)

- MR-6, for WA E911 and ID LIS Trunk;
- MR-8 and MR-8*, for ND LIS Trunk & UBL-2 wire and WY LIS Trunk;
- OP-3, OP-4, OP-5, and OP-6 for all products with parity standards;[2] and
- PO-7A-C and PO-8C.

- Cases in which Volume = 2 (at statewide level) where the volume for PID-specified disaggregations of the results are individually 0 or 1: Statistical analyses for Qwest's results are applied at the PID-specified levels of disaggregation, which may, in some cases, result in a rolled-up statewide volume of 0, 1, or 2.[3] Thus, where the volume is 2 and the measurement "D/ND" (Dispatch/Non-Dispatch) column is blank or a "D," the absence of a modified Z-score is explained by the fact that, at the PID-specified level of disaggregation, the volume is 0 or 1, and so the first principle, above, applies. For these situations, the same conclusion also of "N/A" also applies in the "Met Std" column. Typically, this will be seen in the OP-n and MR-n PIDs that have MSA-type and Zone-Type disaggregations. In the statewide results displayed in the spreadsheet, the two MSA-type disaggregations are rolled up into a single result (and the D/ND column will show, "D"), and the two Zone-type disaggregations are rolled up into a single result (and the D/ND column will be blank, because there is no dispatch characterization for Zone-type products). This explanation covers the following measurements noted in the spreadsheet, although, again, it applies in all cases with the aforementioned condition:

  - OP-4, for ND, LIS Trunk (D/ND = blank), where the Jun 02 Qwest volume is 2; and
  - OP-6B, for CO, UNE-P Centrex, where the Aug 02 Qwest volume is 2.

- Cases in which Colorado has a standard that is different than the other states: In some cases, the Colorado Commission has specified standards in the PAP (Performance Assurance Plan) that are different than those accepted for general 271 purposes in the broader collaborative and OSS test. These are the standards that have been applied for Colorado in the spreadsheet-formatted reporting of Qwest's results. This applies to the following PIDs (products): PO-2, PO-10, OP-3 (for line sharing and sub-loop), OP-4 (for sub-loop), OP-7, and MR-3, -6, -7, & -8 (for line sharing and sub-loop). Accordingly, this explanation covers the following measurements noted in the spreadsheet: MR-7 (for line sharing; also mentioned above, as there was also a correction involved), OP-7, and PO-10.

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[2] See also the explanation that follows these items about the effects of statewide rolled-up results, where the PID-specified disaggregations have volumes of 0 or 1, individually, but they add up to 2.

[3] There is never a case where the PID defines more than two disaggregations within a reported statewide result.

- Cases involving "gated" standards – specifically, MR-11, LNP Trouble Reports Cleared: MR-11A results are "diagnostic" if OP-17, Timeliness of LNP-related Disconnects, results meet its standard of 98.25%. If OP-17's standard is *not* met, the MR-11A standard is 95%, unless volumes are less than 20, in which the standard allows one ticket cleared in more than four hours. Consistent with this, the results report appropriately shows MR-11A to be "N/A" in the "Met Std" column, because the OP-17 standard is met in all cases. As for MR-11B (not noted in the referenced spreadsheet that lists the FCC's questions), it is not "gated" in this way by OP-17's result, but has its own 95% standard (with the same provision where volumes are less than 20).

- Cases involving measurements with parity standards where volumes are always very large and Qwest does not report statistical parameters (i.e., no modified Z-scores are reported): In these cases, involving only measurements MR-2 and OP-2 (Calls Answered within 20 Seconds), the parity evaluation resorts to the "stare and compare" approach in comparing CLEC and Retail results. In effect, with volumes so large (in the tens of thousands or greater), the Retail result represents a benchmark for the CLEC result for that month. The statistical basis is that, where volumes are so large, a statistical analysis would yield the same conclusion as the "stare and compare." Accordingly, the "Met Std" column for these measurements reflects the result of this type of analysis.

The twenty-page limit does not apply to this filing.

Respectfully submitted,

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